

### Remarks

The above Amendments and these Remarks are in reply to the Office action mailed December 26, 2006. Claims 1-26 are presented herewith for consideration.

Currently, claims 1-26 are pending. Applicants have amended claims 1, 7, 11, 14, 23, and 26. Applicants respectfully request reconsideration of claims 1-26.

#### I. Summary of the Examiner's Objections

Claims 1-5 were rejected under 35 U.S.C. §102(e) as being anticipated by U.S. 6,883,000 (hereinafter "*Gropper*").

Claims 7-10 were rejected under 35 U.S.C. §102(b) as being anticipated by U.S. 5,946,687 (hereinafter "*Gehani*").

Claims 11, 15, 16, 21 and 22 were rejected under 35 U.S.C. §102(b) as being anticipated by U.S. 5,974,413 (hereinafter "*Beauregard*").

Claim 6 was rejected under 35 U.S.C. §103(a) as being unpatentable over *Gropper*, in view of *Beauregard*.

Claims 13, 14, 18 and 19 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Beauregard*, in view of Microsoft Outlook 2000, (version 9.0.0.4527; copyrighted 1999) (hereinafter "*Outlook*").

Claim 17 was rejected under 35 U.S.C. § 103(a) as being unpatentable over *Beauregard*, in view of Microsoft Word (copyright 1999) (hereinafter "*MS-Word*").

Claim 20 was rejected under 35 U.S.C. § 103(a) as being unpatentable over *Beauregard*, in view of U.S. 2001/0003183 (hereinafter "*Thompson*").

Claims 23 and 24 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Thompson*, in view of Wordworks (copyright 1997) (hereinafter "*Wordworks*"), further in view of U.S. 6,154,214 (hereinafter "*Uyehara*").

Claims 25 and 26 were rejected under 35 U.S.C. § 103(a) as being unpatentable over *Thompson*, in view of *Wordworks* and *Uyehara*, further in view of *MS-Word*.

#### II. Summary of the Amendments

Applicant has amended Claims 1, 7, 11, 14, 23, and 26.

### III. Remarks

#### A. Rejection of Claims 1-5 Under 35 U.S.C. §102(e) Over Gropper

It is respectfully submitted that Claim 1 is not anticipated by Gropper because Gropper does not disclose “selecting one of a plurality of types of reference material sources based on the unique identifier” as defined in Claim 1. Gropper does not anticipate the claimed invention because each and every feature is not disclosed in the reference.

Gropper discloses a business card and contact management system in which a business card issuer’s contact information can be accessed to update the contact management system, yet there is no mention of “a plurality of types of reference material sources” that is accessed. The only reference material source accessed in Gropper is “the server system in which the card issuer’s contact and advertising information is stored” (col. 4, lines 43-47). There is no “plurality of types of reference material sources” disclosed.

A Universal Contact Locator (UCL) in Gropper is used to access information for a contact in the server system. The Examiner argues that this UCL can be equated to the “unique identifier.” However, even assuming that the UCL equates with the “unique identifier,” Gropper still does not disclose “selecting **one of a plurality** of types of reference material sources based on the unique identifier.” Because these limitations are not disclosed in Gropper, the reference does not anticipate the claim.

Gropper does not disclose “selecting one of a plurality of types of reference material sources based on the unique identifier.” Hence, Gropper does not disclose all of the limitations of independent Claim 1 nor dependent Claims 2-5. Applicant asserts that Claims 1-5 are not anticipated under 35 U.S.C. §102(e). Reconsideration of these claims is respectfully requested.

#### B. Rejection of Claims 7-10 Under 35 U.S.C. §102(b) Over Gehani

It is respectfully submitted that Claim 7 is not anticipated by Gehani because Gehani does not disclose the steps of “receiving a request for a selected reference material associated with a unique identifier,” “determining that an identifier for a user of the selected reference material matches the unique identifier of the selected reference material,” and “providing the selected

reference material in a manner that is relevant to the user,” as defined in Claim 7. Because Gehani does not disclose each and every feature of the claimed invention as defined in Claim 7, the reference does not anticipate the claim.

Gehani discloses a personal information manager (PIM) that allows a user to store and access contact information. Additionally, maps and directions to or from the location of a contact in the PIM can be requested, but the reference does not disclose that this request is “associated with a unique identifier.” There is no “unique identifier” disclosed in Gehani.

Furthermore, Gehani does not disclose the step of “determining that an identifier for a user of the selected reference material matches the unique identifier of the selected reference material” because there is no “identifier for a user” disclosed in Gehani. In Gehani, as understood, contact information is stored without relevance to a “unique identifier.” Since neither the “identifier for a user” nor the “unique identifier” is disclosed in Gehani, the reference does not anticipate the claim.

The Examiner argues that Gehani provides information “in a manner that is relevant to the user,” yet no where in the reference is this disclosed. Instead, Gehani states that maps and directions to or from the location of a contact (“address A”) can be accessed. However, if directions are desired, a start or end address must be supplied:

The GeoServer first asks the user if the address A is the start address or the end address of the requested route. If address A is the start address, the user is requested to supply the end address. Otherwise, the user is requested to supply the start address (col. 5, lines 30-34).

The directions in Gehani are not provided “in a manner that is relevant to the user” because the user must enter the user’s start or end address. The directions in Gehani are relevant to a contact in the PIM, not “to the user.” However, even assuming that Gehani provides information “in a manner that is relevant to the user,” Gehani still does not disclose “selected reference material associated with a unique identifier” or “an identifier for a user.” Therefore, the reference does not anticipate the claim.

Applicant respectfully asserts that the claimed invention is not anticipated by Gehani under 35 U.S.C. §102(b) because Gehani does not disclose “a unique identifier” or “an identifier for a user,” as defined in independent Claim 7. Applicant further asserts that dependent Claims 8-10 are

not anticipated by Gehani for the same reasons. Reconsideration of Claims 7-10 is respectfully requested.

C. Rejection of Claims 11, 15, 16, 21, and 22 Under 35 U.S.C. §102(b) Over Beauregard

It is respectfully submitted that Claim 11 is not anticipated by Beauregard because Beauregard does not disclose that “the request for information is created through a prompt provided to the user based on the monitoring of the actions of the user” nor the step of “selecting one of a plurality of reference material sources,” as defined in Claim 11. Since Beauregard does not disclose each and every feature of the claim, Claim 11 is not anticipated.

Beauregard discloses a user interface that allows a user that is writing an e-mail message to mention several companies by replacing all stock symbols with the actual company name. The “reference material source” is chosen by the system itself. There is no “prompt provided to the user based on the monitoring of the actions of the user” prior to the request for information disclosed in Beauregard.

Additionally, a “plurality of reference material sources” is not disclosed in Beauregard. The only “reference material source” disclosed in Beauregard is “a hypothetical Forbes Stock Symbol and Name conversion application... This application contains the symbols and names of every company and mutual fund traded on United States Exchanges” (col. 52, lines 6-12). Therefore, a “plurality of reference material sources” is not disclosed in Beauregard.

Furthermore, the Examiner argues that the stock symbol in Beauregard can be equated to the “unique identifier associated with a string” in Claim 11 and that the “string” is equivalent to the company name associate with the stock symbol in Beauregard. Even assuming this were true, the “unique identifier” (i.e. the stock symbol) would be replaced with the “string” (i.e. the company name) that is accessed through the conversion application for the “electronic document.” Yet Claim 11 defines “an application program for creating the electronic document... wherein the electronic document comprises a string having a unique identifier associated with the string.” This would mean that the “electronic document” would already comprise the company name associated with the stock symbol and replacement would be unnecessary. This is not the case in Beauregard because Beauregard discloses that the stock symbol is **replaced** by the company name. The “electronic document” does not in fact “[comprise] a string” as claimed. The stock symbol therefore cannot be

equated to the “unique identifier,” nor can the company name be equated to the “string.” However, even assuming equivalence, Beauregard still does not disclose “a prompt provided to the user based on the monitoring of the actions of the user” or “a plurality of reference material source.” Therefore, the reference does not anticipate the Claim 11.

Because Beauregard does not disclose “the request for information... created through a prompt provided to the user based on the monitoring of the actions of the user” or “selecting one of a plurality of reference material sources,” the reference does not include each and every limitation of the claims. Hence, Beauregard does not anticipate independent Claim 11 nor dependent Claims 15, 16, 21, and 22 under 35 U.S.C. §102(b) because the reference does not disclose these features. Reconsideration of these claims is respectfully requested.

D. Rejection of Claim 6 Under 35 U.S.C. §103(a) Over Gropper in View of Beauregard

It is respectfully submitted that Claim 6, which depends from Claim 1, is not obvious over Gropper in view of Beauregard because neither Gropper nor Beauregard teaches “selecting one of a plurality of types of reference material sources based on the unique identifier,” as defined in Claim 1.

As noted above, Gropper does not disclose the aforementioned “selecting” step. Additionally, Beauregard would not lead one of average skill in the art to develop the claimed features. Beauregard teaches a user interface that allows a user that is writing an e-mail message to mention several companies by replacing all stock symbols with the actual company name. There is no mention in Beauregard of a “plurality of reference material sources,” as discussed above. The teachings of Beauregard with respect to Gropper add nothing regarding “a plurality of reference material sources” since no such plurality is disclosed. Furthermore, there is no motivation to combine these two references since Gropper discloses a business card and contact management system and Beauregard discloses an interface that allows a user to mention several companies by replacing all stock symbols with the actual company name.

Therefore, the combination of Gropper and Beauregard would not lead one of average skill in the art to develop the claimed invention as defined in Claim 6, and the claimed invention is not obvious over these references. Reconsideration of this claim is respectfully requested.

E. Rejection of Claims 13, 14, 18, and 19 Under 35 U.S.C. §103(a) Over Beauregard in View of Outlook

It is respectfully submitted that Claims 13, 14, 18, and 19, which depend from Claim 11, are not obvious over Beauregard in view of Outlook because neither Beauregard nor Outlook teaches that “the request for information is created through a prompt provided to the user based on the monitoring of the actions of the user” before “integrating reference material into an electronic document,” as defined in Claim 11.

As noted above, Beauregard does not disclose “the request for information... created through a prompt provided to the user based on the monitoring of the actions of the user.” Additionally, Outlook would not lead one of average skill in the art to develop the claimed features. Outlook teaches how to look up a contact in Outlook’s address book with no mention of “a prompt provided to the user based on the monitoring of the actions of the user” before “integrating reference material into an electronic document.” Outlook, which discloses the address book, adds nothing regarding “a prompt provided to the user based on the monitoring of the actions of the user” since no such prompt is disclosed. Furthermore, there is no motivation to combine Beauregard and Outlook because it would not be obvious to one of average skill in the art to do so.

Therefore, the combination of Beauregard and Outlook would not lead one of average skill in the art to develop the claimed invention as defined in Claims 13, 14, 18, and 19, and the claimed invention is not obvious over these references. Reconsideration of these claims is respectfully requested.

F. Rejection of Claim 17 Under 35 U.S.C. §103(a) Over Beauregard in View of MS-Word

It is respectfully submitted that Claim 17, which depends from Claim 11, is not obvious over Beauregard in view of MS-Word because neither Beauregard nor MS-Word teaches that “the request for information is created through a prompt provided to the user based on the monitoring of the actions of the user,” as defined in Claim 11.

Beauregard does not disclose the aforementioned “request” as previously discussed. Additionally, MS-Word would not lead one of average skill in the art to develop the claimed feature because MS-Word teaches reference dictionaries for different languages with no mention of “the

request for information... created through a prompt provided to the user based on the monitoring of the actions of the user.” MS-Word, which discloses the reference dictionaries for different languages, adds nothing regarding “a prompt provided to the user based on the monitoring of the actions of the user” since no such prompt is disclosed. Furthermore, there is no motivation for combining the Beauregard and MS-Word because it would not be obvious to one of average skill in the art to do so.

Therefore, the combination of Beauregard and MS-Word would not lead one of average skill in the art to develop the claimed invention as defined in Claim 17, and the claimed invention is not obvious over these references. Reconsideration of this claim is respectfully requested.

G. Rejection of Claim 20 Under 35 U.S.C. §103(a) Over Beauregard in View of Thompson

It is respectfully submitted that Claim 20, which depends from independent Claim 11, is not obvious over Beauregard in view of Thompson because neither Beauregard nor Thompson teaches that “the request for information is created through a prompt provided to the user based on the monitoring of the actions of the user,” as defined in Claim 11.

Beauregard does not disclose the aforementioned “request” as previously discussed. Additionally, Thompson would not lead one of average skill in the art to develop the claimed feature because the reference teaches a keyword query that allows access to “a database dictionary which associates keywords with more general concepts” (p. 2, paragraph [0030]) with no mention of “a prompt provided to the user based on the monitoring of the actions of the user.” Thompson, which discloses the keyword query, adds nothing regarding “a prompt provided to the user based on the monitoring of the actions of the user” since no such prompt is disclosed. Furthermore, there is no motivation to combine Beauregard and Thompson because it would not be obvious to one of average skill in the art to do so.

Therefore, the combination of Beauregard and Thompson would not lead one of average skill in the art to develop the claimed invention as defined in Claim 20. Reconsideration of this claim is respectfully requested.

H. Rejection of Claims 23 and 24 Under 35 U.S.C. §103(a) Over Thompson in View of Wordworks and Uychara

It is respectfully submitted that independent Claim 23 and dependent Claim 24 are not obvious over Thompson in view of Wordworks and Uychara because none of these references, alone or in combination, teaches “selecting one of a plurality of dictionary files corresponding to different fields having a specialized vocabulary,” as defined in Claim 23.

Thompson does not disclose “a plurality of dictionary files corresponding to different fields having a specialized vocabulary.” The keyword query disclosed in Thompson only accesses one “dictionary file” for the query, that being “a database dictionary which associates keywords with more general concepts” (p. 2, paragraph [0030]). Additionally, neither Wordworks nor Uychara would lead one of average skill in the art to develop the claimed feature. Wordworks teaches an application that has only one type of dictionary, that being an English dictionary (p. 1, line 3). The disclosure of the Wordworks dictionary application adds nothing regarding “a plurality of dictionary files corresponding to different fields having a specialized vocabulary” since no such plurality is disclosed. Uychara teaches an electronic hand-held reading system with no mention of “dictionary files.” The disclosure of the hand-held reading system adds nothing regarding “a plurality of dictionary files corresponding to different fields having a specialized vocabulary” since no such plurality is disclosed. Furthermore, there is no motivation to combine Uychara with the other references because it would not be obvious to one of average skill in the art to do so.

The present claimed invention allows a user to access different types of dictionary files for “different fields having a specialized vocabulary.” For example, the types of files might be for a particular field such as the medical field (see Specification p. 11, lines 7-10). This limitation is not disclosed in the cited prior art.

Therefore, the combination of the cited prior art references would not lead one of average skill in the art to develop the claimed invention as defined in Claims 23 and 24. Reconsideration of these claims is respectfully requested.



I. Rejection of Claims 25 and 26 Under 35 U.S.C. §103(a) Over Thompson in View of Wordworks, Uychara, and MS-Word

It is respectfully submitted that Claims 25 and 26, which depend from independent Claim 23, are not obvious over Thompson in view of Wordworks, Uychara, and MS-Word because none of these references, alone or in combination, teaches or discloses “selecting one of a plurality of dictionary files corresponding to different fields having a specialized vocabulary” as defined in Claim 23.

Thompson does not disclose the aforementioned feature as previously discussed. Likewise, Wordworks and Uychara would not lead one of average skill in the art to develop the claimed feature as noted above. MS-Word also would not lead one of average skill in the art to develop the claimed feature because MS-Word teaches reference dictionaries for different languages with no mention of “a plurality of dictionary files corresponding to different fields having a specialized vocabulary.” MS-Word, which discloses the dictionaries for different languages, adds nothing regarding “a plurality of dictionary files corresponding to different fields having a specialized vocabulary” since no such plurality is disclosed.

Therefore, the combination of the cited prior art references would not lead one of average skill in the art to develop the claimed invention as defined in Claims 25 and 26. Reconsideration of these claims is respectfully requested.

Based on the above amendments and these remarks, reconsideration of Claims 1-26 is respectfully requested.

The Examiner's prompt attention to this matter is greatly appreciated. Should further questions remain, the Examiner is invited to contact the undersigned agent by telephone.

Enclosed is a PETITION FOR EXTENSION OF TIME UNDER 37 C.F.R. § 1.136 for extending the time to respond up to and including today, April 6, 2007.

The Commissioner is authorized to charge any underpayment or credit any overpayment to Deposit Account No. 501826 for any matter in connection with this response, including any fee for extension of time, which may be required.

Respectfully submitted,

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